

# **EXHIBIT 10**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
Case No:1:17 cv 00256

SHIRLEY TETER, )  
Plaintiff, )  
v. )      **AFFIDAVIT OF**  
PROJECT VERITAS ACTION FUND, )      **FERNANDO ROMERO**  
PROJECT VERITAS, and JAMES E. )  
O'KEEFE, III, )  
Defendants. )

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I, Fernando Romero, being duly sworn, depose and state as follows:

1. I am over the age of 18, and legally competent to testify to all matters set forth herein.
2. I am currently a resident of Florida. In 2012, I lived in the home of my father, William Dejesus Romero, in Raleigh, North Carolina.
3. One afternoon, as I arrived home to care of my sick son, a car with two young white men pulled into my driveway. I did not know them.
4. They got out of the car, and approached me. As one filmed me with a video camera, the other immediately began firing questions about my father:  
“Do you know if he’s a citizen, sir?”

“We have a question for him about his jury duty form.”

“Is he a United States citizen?”

5. They refused to tell me who they were, or whom they represented.
6. I asked that they stop recording, and leave the property. I further directed them not to publish the video without my permission.

7. I later became aware that an outfit called Project Veritas had published a video of my interaction with these two men. The video was published under the caption “NC Non-Citizens Voting, Dead Offered Ballots, UNC Officials Embrace Voter Fraud.” A copy of this video is available on the internet at

<https://www.youtube.com/watch?v=ptSrcNvJzBQ&feature=youtu.be> .

8. In addition to the video taken at my father’s home, the Project Veritas video showed a young man impersonating my father at his voting place. He depicted my father as a clown. He wore lederhosen, a goofy orange cap, and reflective sunglasses, and was carrying some sort of man-purse. His right arm was in a cast.

9. The young man repeatedly told the North Carolina voting official that he was my father. He spoke broken English, in an affected, stereotyped Hispanic accent.

10. The Project Veritas video flatly stated about my father: “He is, however, not a United States citizen.” This statement was untrue. My father has been a citizen of the United States since 2011.

11. The Project Veritas video also falsely stated that my father has been voting in North Carolina while not a citizen. I understand that this is a crime.

12. The Project Veritas video caused a lot of pain for me and my family. In addition to the video itself, Project Veritas issued a press release which led to numerous media outlets repeating the false allegation that my father was voting illegally. For weeks, we received harassing phone calls accusing my father of breaking the law.

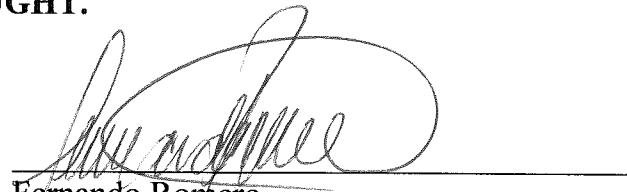
13. In addition, our friends and extended family members began asking if my father had broken the law. He did nothing to deserve these allegations.

14. We consulted with a lawyer, but learned that Project Veritas was the subject of so many defamation lawsuits that seeking recovery would likely be fruitless.

15. I have since learned that, under pressure from legitimate media organizations, Project Veritas acknowledged that they had been wrong: “Other organizations have reviewed our check of jury forms against the voter rolls and have found one individual, Mr. Romero, apparently became a naturalized citizen after refusing jury duty on the grounds of being a non-citizen.”

<https://www.projectveritas.com/2012/05/15/nc-non-citizens-voting-dead-offered-ballots-unc-officials-embrace-voter-fraud/>

FURTHER AFFIANT SAYETH NAUGHT.



Fernando Romero

STATE OF NORTH CAROLINA

COUNTY OF WAKE

I, Melany D. McFall, a Notary Public within and for said County and State, do hereby certify that Fernando Romero personally appeared before me this day and acknowledged the execution of the foregoing instrument.

WITNESS my hand and official seal, this the 28<sup>th</sup> day of DEC., 2018.

Melany D. McFall  
Notary Public signature

Melany D. McFall  
Notary Public name  
My Commission Expires: 10/29/19

